



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

REGION IV, 9140 E. 28TH ST., YUMA, AZ 85365

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September 11, 2008

Nathan Lenon
Biologist, LCR MSCP
Bureau of Reclamation
P.O. Box 61470
Boulder City, NV 89006

Re: LCR MSCP Reaches 5 and 6 Backwater Site Selection

Dear Mr. Lenon:

The Arizona Game and Fish Department (Department), in order to assist the Bureau of Reclamation (Reclamation) in the selection of backwater sites for the Lower Colorado River Multi-Species Conservation Program (LCR MSCP), has evaluated potential conflicts and impacts that may result from the selection and development of backwaters in Reaches 5 and 6 of the lower Colorado River. Reclamation had requested the Department conduct a thorough review of Candidate and Alternate backwater sites in Reaches 5 and 6 in Arizona and provide comments to Reclamation by September 15, 2008. As a result, the Department is providing the following comments for your consideration.

The Backwater Site Selection Process for Reaches 5 and 6

As the Department understands, Reclamation is in the process of identifying 5 backwaters in Reaches 5 and 6 of the lower Colorado River to enter into Step 4: Conduct Backwater Habitat Site Assessments and potentially Step 5: Select Sites for Potential Habitat Creation of the LCR MSCP backwater site selection process. The 5 backwaters considered for Steps 4 and 5 would come from a list of 25 Candidate and 6 Alternate Sites produced by Reclamation in Step 1: Identification of Backwaters for Screening and Evaluation of the process.

Department personnel attended two meetings involving Reclamation, the Fish and Wildlife Service, the Imperial National Wildlife Refuge, and the Bureau of Land Management on August 5 and 7, 2008, and visited some of the backwater sites with Reclamation and Fish and Wildlife Service personnel on August 6, 2008. During these meetings, it was agreed that the Department would garner input from local hunting and angling groups in order to more accurately assess use and potential conflicts associated with the selection and development of specific backwaters for LCR MSCP purposes.

On August 15, 2008, Department personnel met with unaffiliated individuals from the community, members from several angling clubs, as well as a member of the Yuma County

Board of Supervisors, and the Mayor of Yuma. On September 3, 2008, Department personnel also attended a Yuma Valley Rod and Gun Club meeting. During these meetings, we provided brief summaries and general information regarding the background and purposes of the LCR MSCP and the backwater site selection process. We then solicited angling, hunting, and other use information from the attendees pertaining to specific backwaters in Reaches 5 and 6 in Arizona.

These groups indicated that most boat-accessible backwaters are extremely important to the recreational public and that they have concerns regarding potential impacts on local sport fish populations, spawning habitat, public access for waterfowl hunting, fishing, fishing tournaments, and the community economy that may result from the selection and development of boat-accessible backwaters for LCR MSCP purposes. These groups estimated that over 70 fishing tournaments, sponsored by more than 12 local and national organizations are held each year within this stretch of the lower Colorado River. Finally, throughout both meetings, individuals expressed their desire to be included earlier in the decision-making process.

Potential Impacts

Through review and discussions with local angling and hunting groups, the Department has determined that potential impacts to fish and wildlife, angling and hunting, and economic opportunities resulting from the selection and development of some backwaters for LCR MSCP purposes, may include:

- Localized impacts to waterfowl habitat through changes in backwater elevations and associated vegetation resulting from activities designed to modify the backwaters;
- Localized impacts to sport fish populations, spawning, and recruitment resulting from the removal of sport fish from highly productive backwaters;
- The loss of angling and hunting opportunities resulting from currently-accessible backwaters being closed to the public;
- The loss of economic revenue to local communities resulting from fewer opportunities and reduced interest in local fishing tournaments.

Further, through evaluation of each Candidate and Alternate backwater site, we determined that potential conflicts resulting from the selection and development of specific backwaters for LCR MSCP purposes are likely to occur as follows:

A43.5

A43.5 is also called "Mittry Lake." This backwater is managed by the Department for waterfowl resting grounds and propagation of fish. This backwater is directly accessible by boat from a boat ramp, and is frequently used by anglers and wildlife watchers. High conflict would result if developed and implemented for LCR MSCP purposes.

A50.5

A50.5 is also called "Lake 2 on the Oasis Channel" by local anglers. This backwater is very close to Hidden Shores, is directly accessible by boat from the river and is frequently used by anglers, waterfowl hunters, and wildlife watchers. This backwater is also reported to have very good bass spawning and recruitment. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A49.2

A49.2 is not accessible by boat from the river. If waterfowl hunting would be permitted, the Department does not anticipate conflicts if Reclamation pursues this site for selection as an LCR MSCP backwater. Additionally, this backwater was reported to have good bass fishing when it was still accessible.

A51.4

A51.4 is directly connected to the Arizona Channel, which Reclamation widened in 2008 to improve flows through backwaters and to improve public access. This backwater is reported to be frequently used by anglers and other outdoor enthusiasts. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A53.4

A53.4 is directly connected to the Arizona Channel, which Reclamation widened in 2008 to improve flows through backwaters and to improve public access. This backwater is reported to be frequently used by anglers and other outdoor enthusiasts. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A54.3

A54.3 is directly connected to the Arizona Channel, which Reclamation widened in 2008 to improve flows through backwaters and to improve public access. This backwater is reported to be frequently used by anglers and other outdoor enthusiasts. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A55.4

A55.4 is not accessible by boat from the river, although this backwater is reported to be frequently used by waterfowl hunters. If waterfowl hunting would be permitted, the Department does not anticipate conflicts if Reclamation pursues this site for selection as an LCR MSCP backwater.

A59.7 (Headquarters Lake)

A59.7 is currently closed to public access. The Department does not anticipate conflicts if Reclamation pursues this site for selection as an LCR MSCP backwater.

A62.3 (Secret Lake)

A62.3 is also called "Clear Lake" by local anglers. This backwater is directly accessible by boat from the river and is frequently used by anglers and waterfowl hunters. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A62.5 (Clear Lake)

A62.5 is also called "Yuma Wash Lake" by local anglers. This backwater is not accessible by boat from the river; however, it is frequently utilized for waterfowl hunting. If waterfowl hunting would be permitted, the Department does not anticipate conflicts if Reclamation pursues this site for selection as an LCR MSCP backwater.

A63.7 (Cable Lake)

A63.7 is also called "Tunnel Lake" by local anglers. This backwater is directly accessible by boat from the river and is frequently used by anglers and waterfowl hunters. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A64.5 (Lookout Lake)

A64.5 is also called "Pocket Lake" and "Hand Lake" by local anglers. This backwater is directly accessible by boat from the river and is frequently used by anglers. This backwater is also reported to have very good bass spawning and recruitment. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A67.5

A67.5 is minimally accessible by boat from the river (perhaps only in the spring) and is occasionally used by anglers. Moderate conflict may result if Reclamation pursues this site for selection as an LCR MSCP backwater.

A67.9 (Hidden Lake)

A67.9 is also called "Parallel Lake" by local anglers. This backwater is directly accessible by boat from the river and is frequently used by anglers. This backwater is also reported to have very good bass spawning and recruitment. High conflict would likely result if developed and implemented for LCR MSCP purposes.

A69.7c

A67.9 is also called "Little Norton Lake" by local anglers. This backwater is directly accessible by boat from the river and is frequently used by anglers. High conflict would likely result if developed and implemented for LCR MSCP purposes.

Department Recommendations

To minimize and avoid the potential impacts to sport fish habitat and populations, angler and hunter opportunities, and community economies resulting from the development of backwaters for LCR MSCP purposes, the Department proposes several recommendations. We understand that implementing these recommendations may require support and authorization from land

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owners and managers (for example, the Imperial National Wildlife Refuge and the Bureau of Land Management), as well as the LCR MSCP Steering Committee.

1. We strongly support and recommend the selection and development of A59.7 (Headquarters Lake) for LCR MSCP purposes because the Department does not anticipate any recreation, fish, or wildlife-related conflicts.
2. If waterfowl hunting is deemed a compatible use at LCR MSCP backwater sites, then the Department does not anticipate any conflicts with developing and implementing the following backwaters for LCR MSCP purposes:
 - a. A49.2
 - b. A55.4
 - c. A62.5 (Clear Lake)
3. The Department anticipates that selecting and developing the following backwaters for LCR MSCP purposes may result in moderate or high conflicts for reasons discussed in this letter:
 - a. A43.5 – high
 - b. A50.5 – high
 - c. A51.4 – high
 - d. A53.4 – high
 - e. A54.3 – high
 - f. A62.3 – high
 - g. A63.7 – high
 - h. A64.5 – high
 - i. A67.5 – moderate
 - j. A67.9 – high
 - k. A69.7c – high
4. If Reclamation chooses to select and develop backwaters for LCR MSCP purposes that are frequently used by anglers, the Department believes that creating inlet and outlet channels to provide boating access for anglers, and to increase water exchange and flow-through to improve water quality at currently-inaccessible backwaters of similar size and location, may adequately compensate for the loss of angling opportunities in many instances.
 - a. For example, if Reclamation selects and develops A62.3 (Secret Lake) for LCR MSCP purposes, then the Department believes suitable compensation would entail creating boating access and flow-through channels at A62.5 (Clear Lake).
5. The Department notes that the backwater site selection process relies primarily on current measurements of water quality, spawning habitat, and cover. As a result, backwaters that have a direct connection to the river will generally have favorable water quality and perhaps overall rating scores vs. isolated backwaters. The Department believes that this

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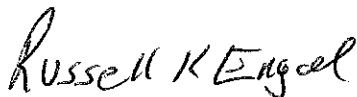
analysis, however, may not adequately account for changes in water quality resulting from the development of backwaters for LCR MSCP purposes. That is, water quality in connected backwaters may diminish following the intentional (semi-) isolation from the river with the utilization of screens, filters, or earthen berms to prevent the re-colonization of backwaters by non-native fishes. Whereas, water quality in isolated backwaters would likely benefit from the utilization of pumps, new in/out-flow channels, and other methods designed to increase water exchange and flow-through.

As such, if Reclamation is unable to select backwater sites that minimize or avoid conflict, or is unable to adequately compensate for the resulting loss of angling opportunities, the Department recommends broadening the backwater search to include potential sites not currently evaluated. Some potential areas, as discussed on August 7th and 8th, may include sites near Headquarters Lake, sites immediately below Imperial Dam, ponds adjacent to irrigation canals (perhaps, along the Gila Main Gravity Canal or All-American Canal), as well as other isolated backwaters that may have been eliminated from the selection process due to low water quality.

6. Finally, we recommend that future backwater site selections include thorough inter-agency and public involvement beginning with Step 1 of the selection process. This increased early involvement will undoubtedly complicate the selection process at the start, but it will also help to identify many potential conflicts (e.g., legal, user, etc.) that are likely to become evident later in the process. This involvement should also help to effectively and efficiently narrow the selection of potential backwater sites early in the process, ultimately saving time and resources later by focusing on backwaters with minimal potential conflicts.

The Department applauds the efforts of Reclamation and the LCR MSCP in your willingness to fully evaluate issues surrounding the backwater site selection process, given the complexity and difficulty of trying to fulfill program objectives while accounting for broad stakeholder interests. We appreciate the opportunity to provide comments and recommendations and look forward to continued communication and cooperation throughout the backwater site selection, development, and implementation process. Please contact Troy Smith at 928-341-4068 if you have any questions, or would like to further discuss our comments and recommendations.

Sincerely,



Russell K. Engel
Habitat Program Manager
Region IV, Yuma

RKE:tgs

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cc: Terry Murphy, Restoration Group Manager, LCR MSCP
Mitch Ellis, Complex Manager, Southwest Arizona NWR Complex
Leslie Fitzpatrick, Fish and Wildlife Biologist, USFWS
Jeff Young, Wildlife Biologist, BLM
Pat Barber, Regional Supervisor, Region IV
Dave Weedman, Aquatic Habitat Coordinator, Habitat Branch
Gregg Cummins, Native Fish Specialist, Region III